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**Comments regarding
Lower Passaic River Restoration Project
Field Sampling Plan (FSP), 2007 Surficial Sediment Grab Sampling**

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&
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Consultants for the Cooperating Parties Group (CPG) of potentially responsible parties (PRPs) in this Superfund case have submitted proposals for implementing Remedial Investigation/Feasibility Studies (RI/FS). Their most recent submission was on 28 September 2007.¹ We have reviewed some of these documents, and offer the following observations.

The revised surficial sediment grab sampling plan for 2007 is acceptable to us.² We appreciate and support the addition of benthic invertebrate assessments at nine locations. We are concerned that the data gathered will only be useful for characterizing surficial sediment contamination. Many past studies have shown that the sediment contaminants of greatest concern in the Lower Passaic River are dioxin, pesticides, and PCBs, which are no longer being produced, and which are mostly buried in the sediments. This "initial" step is to be used for planning 2008 sampling efforts, which would include a "required coring effort".³ We would appreciate further information as to how the data from the surficial grab samples will be used to indicate where coring samples at depth should be taken in 2008.

The data being gathered by the consultants for the CPG in 2007 will provide additional useful information. We look forward to reviewing the results of these studies in early 2008, and comparing them with those of past studies. These RI/FS studies and those planned for 2008 will be helpful in planning for the restoration of the Lower Passaic River, but they should not be used as justification to further delay implementation of an appropriate Early Action project to reduce the risks from the most hazardous persistent contaminants in the sediments of the Lower Passaic River and Newark Bay.

¹ ENSR. 2007. Proposed Lower Passaic River Restoration Project (LPRRP), 2007 Surficial Grab Sampling, FSP/QAPP Addendum 2007-01. Submitted 28 September 2007 to U.S. EPA, Region 2.

² ENSR. 2007. Proposed Lower Passaic River Restoration Project (LPRRP), 2007 Surficial Grab Sampling, FSP/QAPP Addendum 2007-01. Submitted 28 September 2007 to U.S. EPA, Region 2.

³ ENSR. 2007. Proposed Lower Passaic River Restoration Project (LPRRP), 2007 Surficial Grab Sampling, FSP/QAPP Addendum 2007-01. Submitted 28 September 2007 to U.S. EPA, Region 2. Page 4 of 12.